

To: JenniferA Wilson[Wilson.JenniferA@epa.gov]; Schaufelberger, Daniel[schaufelberger.daniel@epa.gov]
From: Matson, John
Sent: Tue 3/24/2015 7:14:04 PM
Subject: What it comes down to

USG contends that under PSD, “BACT only applies to a physically or operationally changed ‘emissions unit,’” which it notes is defined at 40 C.F.R. § 52.21(b)(7) as, “any part of a stationary source that emits or would have the potential to emit any regulated NSR pollutant.”

USG is improperly inserting BACT requirements and language (“emissions unit) into the “major modification” requirement of a “physical change to a major stationary source.”